

JASON M. FRIERSON  
United States Attorney  
Nevada Bar No. 7709

DAVID PRIDDY, ILSBN 6313767  
Special Assistant United States Attorney  
Office of the General Counsel  
Social Security Administration  
6401 Security Boulevard  
Baltimore, MD 21235  
Telephone: (510) 970-4801  
Facsimile: (415) 744-0134  
E-Mail: David.Priddy@ssa.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

SCOTT REESE,

Plaintiff,

v.

KILOLO KIJAKAZI,  
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:22-cv-01722-DJA

**STIPULATION TO VOLUNTARY  
REMAND PURSUANT TO SENTENCE  
FOUR OF 42 U.S.C. § 405(g) AND TO  
ENTRY OF JUDGMENT FOR  
PLAINTIFF**

IT IS HEREBY STIPULATED by and between the parties, through their undersigned attorneys, and with the approval of the Court, that this action be remanded for further administrative action pursuant to the Social Security Act § 205(g), as amended, 42 U.S.C. § 405(g), sentence four.

On remand, the Appeals Council will remand the case to an administrative law judge (ALJ) for a new decision. The ALJ will further develop the record as necessary, offer Plaintiff the opportunity for a new hearing, and issue a new decision.

1 The parties further request that the Clerk of the Court be directed to enter a final judgment in  
2 favor of Plaintiff, and against Defendant, reversing the final decision of the Commissioner.

3  
4 Dated: April 20, 2023 Respectfully submitted,

5 LAW OFFICES OF LAWRENCE D. ROHLFING, INC., CPC

6 /s/ Marc V. Kalagian  
7 MARC V. KALAGIAN  
8 (\*as authorized via email on April 19, 2023)  
9 Attorney for Plaintiff

10 Dated: April 20, 2023 Respectfully submitted,

11 JASON M. FRIERSON  
12 United States Attorney

13 /s/ David Priddy  
14 DAVID PRIDDY  
15 Special Assistant United States Attorney  
16 Attorneys for Defendant

17 IT IS SO ORDERED:

18   
19 HON. DANIEL J. ALBRECHTS  
20 UNITED STATES MAGISTRATE JUDGE

21 DATED: April 21, 2023  
22  
23  
24  
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**CERTIFICATE OF SERVICE**

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, Maryland 21235. I am not a party to the above-entitled action. On the date set forth below, I caused service of **STIPULATION TO VOLUNTARY REMAND PURSUANT TO SENTENCE FOUR OF 42 U.S.C. § 405(g) AND TO ENTRY OF JUDGMENT FOR PLAINTIFF** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Leonard Stone  
Shook & Stone, Chtd.  
710 South 4th Street  
Las Vegas, NV 89101  
702-385-2220  
Fax: 702-384-0394  
Email: lstone@shookandstone.com

Marc V. Kalagian  
Law Offices of Lawrence D. Rohlfing, Inc., CPC  
12631 East Imperial Highway  
Suite C115  
Santa Fe Springs, CA 90670  
562-273-3702  
Fax: 562-868-5491  
Email: marc.kalagian@rksslaw.com

Attorneys for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 20, 2023

/s/ David Priddy  
DAVID PRIDDY  
Special Assistant United States Attorney